

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHASE WILLIAMS and WILLIAM
ZHANG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY
FUND LLC and JOHNNY HONG,
Individually and on Behalf of All Others
Similarly Situated,,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No. 1:20-cv-03829-LAK

CLASS ACTION

JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING THE FILING OF
A RESPONSE TO THE
AMENDED COMPLAINT BY
DEFENDANT BROCK
PIERCE

Plaintiff Crypto Assets Opportunity Fund (“Lead Plaintiff”), individually and on behalf of all others similarly situated, and Defendant Brock Pierce (together, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on September 15, 2020, plaintiffs caused defendant Brock Pierce to be served with the summons and the then-operative complaint (the “Original Complaint”);

WHEREAS, on September 18, 2020, Lead Plaintiff filed an amended class action complaint, Dkt. No. 66 (the “Amended Complaint”), which has been served on Mr. Pierce through the undersigned counsel;

WHEREAS, the current deadline for defendants Block.one and Daniel Larimer to move to dismiss, answer, or otherwise respond to the amended complaint is November 2, 2020, Dkt. 28;

WHEREAS, the Parties wish to conform the response deadline for Mr. Pierce with the response deadline for Block.one and Mr. Larimer;

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the Parties, subject to the Court’s approval, as follows:

1. The deadline for Mr. Pierce to move to dismiss, answer, or otherwise respond to the amended complaint is November 2, 2020.

Date: New York, NY
September 23, 2020

Respectfully submitted,

/s/ Daniel L. Berger

GRANT & EISENHOFER P.A.

Jay W. Eisenhofer
Daniel L. Berger
Caitlin M. Moyna
485 Lexington Avenue
New York, NY 10017
Tel.: (646) 722-8500
Fax: (646) 722-8501
Email: jeisenhofer@gelaw.com
Email: dberger@gelaw.com
Email: cmoyna@gelaw.com

*Lead Counsel for the Class and for
Lead Plaintiff Crypto Assets
Opportunity Fund*

Attorneys for Plaintiffs

/s/ Edmund Polubinski III

Greg D. Andres
Edmund Polubinski III
Andrew S. Gehring
Gabriel Jaime-Bettan
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, NY 10017
greg.andres@davispolk.com
edmund.polubinski@davispolk.com
andrew.gehring@davispolk.com
gabriel.jaime@davispolk.com

Neal A. Potischman
DAVIS POLK & WARDWELL LLP
1600 El Camino Real
Menlo Park, CA 94025
neal.potischman@davispolk.com

/s/ Brian E. Klein

Brian E. Klein
Scott M. Malzahn
Teresa L. Huggins
BAKER MARQUART LLP
777 S. Figueroa Street, Suite 2850
Los Angeles, CA 90017
bklein@bakermarquart.com

*Attorneys for Defendants Block.one,
Daniel Larimer, and Brock Pierce*

SO ORDERED:

Dated: _____, 2020

Hon. Lewis A. Kaplan
United States District Judge